



Dave Heineman
Governor

#48518
AIR 053 00001
STATE OF NEBRASKA

DEPARTMENT OF ENVIRONMENTAL QUALITY
Michael J. Linder
Director

Suite 400, The Atrium
1200 'N' Street
P.O. Box 98922
Lincoln, Nebraska 68509-8922
Phone (402) 471-2186
FAX (402) 471-2909
website: www.deq.state.ne.us

September 24, 2012

Mr. Derril Marshall, General Manager
Fremont Department of Utilities
400 East Military Avenue
Fremont, NE 68025-5141

Re: Request for Compliance Date Extension, Lon D. Wright Power Plant, Unit 8, Mercury and Air
Toxics Standards (MATS) under 40 CFR 63, Subpart UUUUU, City of Fremont, Nebraska – NDEQ
Facility ID# 48518

Dear Mr. Marshall:

In your letter dated September 18, 2012, you requested written approval from the Nebraska Department of Environmental Quality (NDEQ) to extend the Mercury and Air Toxics Standards (MATS) compliance deadline, specifically for NESHAP Subpart UUUUU, for Unit 8 at the Lon D. Wright Power Plant by one year. The City of Fremont owns and operates the Lon D. Wright Power Plant and is subject to MATS. This request is made in accordance with 40 CFR 63.9(c) and per the requirements listed in 40 CFR 63.6(i)(6)(i) in support of an extension request.

The NDEQ agrees that your request is reasonable and meets the requirements per 40 CFR 63.6(i)(6)(i). The Fremont Department of Utilities proposes to install the following on Unit 8

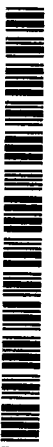
- A baghouse for removal of particulate matter or selected non-mercury metals;
- A mercury sorbent injection system; and
- Potentially an acid gas removal system.

Additionally, Fremont Department of Utilities is planning to combine the ash handling system of the modified Unit 8 with the ash handling system for Units 6 and 7. To minimize down-time, the construction and tie-in will be staged.

Fremont Department of Utilities proposed the following schedule for compliance:

December 14, 2012
May 28, 2013

Issue bid documents to potential EPC contractors
Award EPC Contract



June 2013	Submit minor permit application
November 2013	Receive permit to construct
December 3, 2013	Initiate on-site construction
October 2015	Outage window for ductwork tie-in
November 20, 2015	Complete on-site construction
January 20, 2016	Complete continuous monitor certification
February 19, 2016	EPC contractor completes compliance demonstration testing
April 16, 2016	Date final compliance achieved

NDEQ is approving the extension request, under Subpart UUUUU of the MATS, proposed by Fremont Department of Utilities for Unit 8 at the Lon D. Wright Power Plant. As required in 40 CFR 63.6(i)(4)(i)(A), Fremont Department of Utilities shall apply to modify their Title V permit to incorporate the conditions of this extension of compliance.

If you have any questions concerning this matter, please contact Brian Kozisek of my staff at (402) 471-6624 or brian.kozisek@nebraska.gov.

Sincerely,



Shelley Schneider, Administrator
Air Quality Division

Cc: Angela Catalano, EPA Region VII, APCB
Todd Ellis, NDEQ
Brian Kozisek, NDEQ